

REMARKS

Claims 1-22 are pending. No new matter has been added. In view of the following remarks, it is respectfully submitted that all of the presently pending claims are allowable.

Claims 1-22 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,122,757 to Kelley (hereinafter "Kelley") in view of U.S. Patent No. 6,411,992 to Srinivasan et al. (hereinafter "Srinivasan"). (*See 8/1/05 Office Action*, page 2, ¶ 2).

Kelley provides a system of generating code to match patterns in a protocol analyzer. (*See Kelley*, Abstract). Pattern matching is a technique used to examine the data portion of individual frames that pass along a communication link between first and second devices. (*See Kelley*, Col. 1, ll. 23-26). In other words, the frames received by the second device are compared to pre-existing patterns stored in the second device. This technique may be used to trigger predetermined events, capture frames, filter specific frames, or identify frame errors. (*See Kelley*, Col. 2, ll. 33-41).

Kelley purports to improve upon the brute force system of word-by-word comparison of a pattern against input data, because the brute force system necessarily results in the "worst case" number of comparisons. (*See Kelley*, Col. 1, ll. 50-67). Acknowledging that some patterns may be subsets of others, Kelley groups sets of patterns by relationship type and generates a hierarchy of code which eliminates particular types of patterns, which cannot possibly match, from the comparison process. (*See Kelley*, Col. 2, l. 51 – Col. 3, l. 1). Specifically, Kelley discloses an analysis performed in comparing patterns P and P' of a word W, wherein each bit in the patterns P and P' has a corresponding bit in masks M1 and M2, respectively. (*See Kelley*, Col. 6, ll. 57-59; Fig. 4). The bits of the masks M1 and M2 indicate whether the corresponding bits of the patterns P and P' matter. (*See Kelley*, Col. 6, l. 59 - Col. 7, l. 6). For example, a "0" mask bit position may indicate a "don't care" pattern bit position, whereas a "1" mask bit

position indicates a "care" pattern bit position. (*See id.*). The patterns and corresponding masks are then ANDed and compared. (*See Kelley*, Col. 7, ll. 8-14).

Srinivasan describes a method and system for broadcasting advertisements over a data network. (*See Srinivasan*, Abstract). A series of tables respectively contain information regarding descriptions of the programs being broadcast, the times when commercial breaks occur, the identification number assigned to each commercial, and information relating to system users who have logged-on to the broadcast server. (*See Srinivasan*, Col. 7, l. 54 – Col. 8, l. 65). Another table is used to determine an occurrence of commercial breaks in a program. (*See Srinivasan*, Col. 8, ll. 32-40). When a commercial break is reached, the tables are accessed in order to broadcast commercials to individual users based on their particular demographic information. (*See Srinivasan*, Col. 9, ll. 10-34).

In contrast, independent claim 1 of the present application recites "*creating a first data structure... representative of a first set of properties related to a user*" and "*creating a second data structure... representative of whether said first set of properties is known.*" The Examiner purports that Kelley's disclosure of P pattern bits and M1 mask bits are equivalent of these claim limitations. (*See 8/1/05 Office Action*, page 2, ¶ 4). Although acknowledging that Kelley does not teach that the first set of properties is "related to a user," the Examiner contends that this deficiency is cured by Srinivasan's disclosure of broadcasting commercials to viewers according to demographic information. (*See 8/1/05 Office Action*, page 3, ¶ 4). However, the Applicants respectfully traverse for the following reasons.

Neither Kelley nor Srinivasan, either alone or in combination, teach or suggest "creating a second data structure... representative of whether a first set of properties is known." Kelley's discussion of pattern bits and mask bits nowhere mentions that a mask bit may be used to indicate whether a pattern bit is known. Kelley merely states that a mask bit may indicate whether the position of the pattern bit matters. That is, the mask bit indicates whether or not one should care if the corresponding pattern bit is a "1" or a "0." There is never a question of

whether the position of the pattern bit is known. Similarly, the mask bits may not be seen as "representative of whether said target set of properties is wanted," which is wholly different from representing a materiality of a bit. Further, representing whether a target set of properties is wanted is also wholly different from representing whether a different set of properties is known. Thus, where claim 1 recites data structures which represent entirely different concerns, the mask bits of Kelley always represent a sole concern of whether a corresponding bit is a "0" or a "1."

Although the Applicants do not accept the Examiner's argument that Kelley, read in view of Srinivasan's mention of user demographics, discloses "creating a first data structure... representative of a first set of properties *related to a user*," the Applicants wish to point out Srinivasan also fails to disclose "creating a second data structure... representative of whether a first set of properties is known." Srinivasan nowhere discusses whether a user's demographics may or may not be known, and thus Srinivasan also fails to mention a data structure which is indicative of such.

While sustaining the argument that there is no motivation to combine the disclosures of Kelley and Srinivasan, the Applicants submit that even such combination does not meet the limitations recited in claim 1. Specifically, neither Kelley nor Srinivasan, either alone or in combination, teach or suggest "creating a second data structure... representative of whether a first set of properties is known." Therefore, it is respectfully submitted that the rejection of independent claim 1 should be withdrawn. Because claims 2-8 depend from and therefore include all the limitations of claim 1, it is respectfully submitted that the rejections of these claims should also be withdrawn.

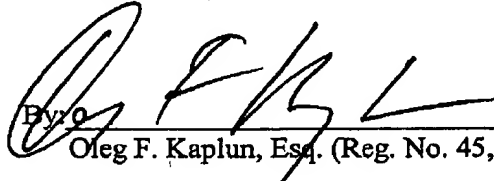
The Examiner rejected independent claims 9 and 22 based on the same grounds used in the rejection of claim 1. (*See 8/1/05 Office Action*, page 2, ¶ 4; page 5, ¶ 7). Therefore, for at least the reasons discussed above with respect to claim 1, it is respectfully submitted that claims 9 and 22 should also be allowed. Because claims 10-21 depend from and therefore include all the limitations of claim 9, it is hereby submitted that these claims are also allowable.

CONCLUSION

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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